

NIGHT BOX
FILED

JUL 16 2002

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6309-CR-SEITZ(S)(S)

CLARENCE MADDOX
CLERK, USDC / SDFL / MIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

JOHN MAMONE, and
DAVID BELL,
Defendants.

AMERICAN BANKERS INSURANCE COMPANY,
Corporate Surety,

and

ANA GRACE MAMONE,
JOSEPH V. MAMONE,
MICHELLE VARTANIAN,
RALPH VARTANIAN,
JAMES C. GUICE,
CONNIE R. GUICE,
LARRY R. SWITZER,
CAROL L. SWITZER,

AMERICAN SURETY COMPANY,
Corporate Surety,

and

STACEY BELL

Surety.

GOVERNMENT'S MOTION TO WITHDRAW GOVERNMENT'S
MOTION FOR REVOCATION AND ESTREATURE AND FOR ENTRY
OF A FINAL JUDGMENT OF FORFEITURE OF APPEARANCE BONDS

The United States of America, through its undersigned
Assistant United States Attorneys, respectfully files this motion

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AD

to withdraw the previously filed Government's Motion for Estreature of Appearance Bond for defendants John Mamone and David Bell and in support thereof states as follows:

1. On August 22, 2001, the government filed a motion for estreature of the corporate surety and personal surety bonds relating to the defendants John Mamone and David Bell based upon their commission of criminal violations while on bond.

2. On August 27, 2001, the government filed a motion to hold the request for estreature in abeyance in order to allow the government an opportunity to meet with the sureties and their attorneys.

3. The government has since met or communicated with all the third-parties sureties. In light of the information provided by those individuals and their attorneys, as well as the government's investigation concerning the background of these individuals, the government believes that estreature of the bonds should not be ordered.

WHEREFORE, the government respectfully requests that this motion to withdraw the previously filed motions for estreatment of bond be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY certify that a true and correct copy of the foregoing was mailed this 16th day of July, 2002 to:

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